

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Case Nos.: 14CR0387-MMA

## PROTECTIVE ORDER

[Doc. No. 30]

RAVNEET SINGH (1),  
ELECTIONMALL, INC. (2),  
MARCO POLO CORTES (3).

## Defendants.

This matter comes before the Court upon the unopposed *ex parte* motion of the United States for a protective order to safeguard discovery from disclosure to persons outside of the defense teams. After considering the motion and the file in this case, and pursuant to Federal Rules of Criminal Procedure (“Rules”) 6(e) and 16(d), and General Order No. 514-C of the United States District Court for the Southern District of California, the Court finds good cause for the relief requested.

111

1 Accordingly, the Court **ORDERS** as follows:

2 1. The United States may provide defense counsel with grand jury testimony  
3 and other matters occurring before the grand jury to the extent necessary to satisfy the  
4 United States' discovery obligations;

5 2. The United States may provide defense counsel with tax returns and tax  
6 information, pursuant to Title 26, United States Code, Section 6103(i)(4)(A);

7 3. Materials under seal may be provided to the defense. The defense shall file a  
8 motion to unseal the documents with notice to the United States before any pleadings or  
9 exhibits referencing or containing these materials may be publicly filed;

10 4. All documents and materials produced by the United States in criminal  
11 discovery in this case are for use by counsel of record as indicated by the docket in this  
12 case and any superseding case only, and paralegals, investigators, experts, and secretaries  
13 employed by the attorneys of record and performing work on behalf of the defendant in  
14 this criminal case only;

15 5. Counsel of record shall ensure that every member of the defense team to  
16 receive discovery materials is advised of this Order and agrees in a signed written  
17 acknowledgment, filed with this Court, to be bound by its terms;

18 6. If it is necessary for the preparation of the defense of this criminal case, the  
19 defense team is permitted to show discovery material to witnesses or to attorneys assisting

1 the defense team. The defense team shall inform these witnesses and attorneys of the  
2 provisions of this order;

3 7. Such witnesses and attorneys shall not be permitted to retain any version or  
4 copy (whether complete or partial, photocopied, hand-copied or otherwise reproduced) of  
5 discovery materials;

6 8. Should a defense team wish to use discovery material at trial, the defendant's  
7 attorneys must redact any personal identifying information in the materials in accord with  
8 Federal Rule of Criminal procedure 49.1 and the General Orders of this Court;

9 9. Nothing herein should be construed as enlarging the United States' discovery  
10 obligations or creating any right to material not otherwise discoverable, as determined by  
11 the Government or as directed by the court; and

12 10. At the conclusion of the proceedings in district court, counsel of record shall  
13 return to the United States any discovery materials immediately upon request, or certify  
14 that such materials have been destroyed.

15  
16 **IT IS SO ORDERED.**

17 DATED: February 19, 2014

18  
19   
20 HON. MICHAEL M. ANELLO  
21 UNITED STATES DISTRICT JUDGE